

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**
(Northern Division)

JUDITH THOMAS

Plaintiff,

v.

SMITH, DEAN & ASSOCIATES, INC.
SIGNATURE MANAGEMENT SOLUTIONS, LLC
WORLDWIDE ASSET PURCHASING, LLC
WORLDWIDE ASSET PURCHASING II, LLC
LYONS DOUGHTY & VELDHUIS, P.C.

Defendants.

Case No. 1:10-cv-3441-ELH

RESPONSE TO ORDER TO SHOW CAUSE

Plaintiff Judith Thomas, by and through her attorney Cory L. Zajdel of Z LAW, LLC, hereby files this Response to Order to Show Cause pursuant to this Court's Show Cause Order (Docket #18) and for support states as follows:

1. Plaintiff Judith Thomas filed this action on December 7, 2010 against Smith, Dean & Associates, Inc. ("Smith, Dean") and Signature Management Solutions, LLC ("Signature"). Docket #1.

2. Plaintiff filed an Amended Complaint adding Defendant Lyons, Doughty & Veldhuis, P.C. ("LD&V"), Worldwide Asset Purchasing, LLC ("WAP") and Worldwide Asset Purchasing II, LLC ("WAP II") on December 29, 2010. Docket #5.

3. Plaintiff filed a Second Amended Complaint correcting the address for Smith, Dean and Signature on January 13, 2011. Docket #10.

4. Plaintiff filed a return of service along with supporting exhibits as to Smith, Dean on March 29, 2011. Docket #17.

5. The return of service and supporting exhibits identify that Smith, Dean was served by substitute service on the Maryland State Department of Assessments and Taxation (“SDAT”) on January 21, 2011 and that the SDAT forwarded the service to Smith, Dean on February 28, 2011. Docket #17.

6. On April 30, 2010, this Court Ordered Plaintiff to “show cause why this case should not be dismissed, without prejudice, as to defendants [Signature, LD&V, WAP and WAP II].” Docket #18.

7. In response to the Show Cause Order, Plaintiff filed a Notice of Voluntary Dismissal with prejudice as against LD&V. Docket #19.

8. Also in response to the Show Cause Order, Plaintiff filed a Notice of Voluntary Dismissal without prejudice as against WAP and WAP II. Docket #20.

9. The Court dismissed LD&V, WAP and WAP II pursuant to Plaintiff’s request. Docket #22 and 23.

10. Finally, Plaintiff filed a return of service along with supporting exhibits as to Signature on May 2, 2011. Docket #21.

11. The return of service and supporting exhibits identify that Signature was served by substitute service on the Maryland State Department of Assessments and Taxation (“SDAT”) on January 21, 2011 and that the SDAT forwarded the service to Signature on February 28, 2011. Docket #21.

12. Since the Court has dismissed LD&V with prejudice and WAP and WAP II without prejudice, only Smith, Dean and Signature remain as Defendants.

13. Plaintiff intends to move for default against Smith, Dean and Signature no later than Friday, May 6, 2011.

14. Accordingly, Plaintiff requests that this Court not dismiss this case against Defendant Signature.

Respectfully submitted,

Z LAW, LLC

Dated: May 2, 2011

By: /s/ **28191**
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